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November 21, 2022

Via CM/ECF Only

Hon. Miroslav Lovric
US District Court
Northern District of New York
Binghamton U.S. Courthouse
15 Henry St.
Binghamton, NY 13901

**RE: *CNY Fair Hous., Inc., et al. v. Clover Grp. Inc., et al.*
Case No. 5:21-cv-361-BKS-ML (N.D.N.Y.)**

Dear Judge Lovric:

Please accept this letter as the parties' joint status report in the above-action regarding the progress of the litigation pursuant to the Court's Text Order dated October 11, 2022 (Doc. No. 55).

The Mediator's Report of Mandatory Mediation was filed on October 26, 2022, reflecting that the related case (*CNY Fair Hous., Inc., et al. v. Clover Constr. Mgmt., Inc., et al.*, Case No. 5:22-cv-278-BKS-ML) settled, but that this action has not settled. (Doc. No. 56).

Since the formal conclusion of mediation, counsel have been continuing direct settlement discussions and wish to focus on settlement negotiations in an effort to resolve the action for a period of 60 days (taking into account the holiday season) before turning their attention to discovery and motion practice.

If settlement negotiations do not continue in a productive manner during that time period, the parties intend to proceed with discovery and plaintiffs intend to move to amend the complaint to include additional allegations to seek class action status; defendants will oppose such motion.

Please let us know if you require any further information at this time.

Respectfully submitted,

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s/Elizabeth A. Kraengel

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